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November 29, 2022

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United States District Court  
District of New Jersey - Camden Vicinage  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets - Room 1050  
Camden, NJ 08101  
Attn: Honorable Ann Marie Donio

RE:

Estate of Alissa Marie Allen, et al vs. Cumberland County, et al	1:15-cv-06273
Estate of David Hennis, et al vs. Cumberland County, et al	1:16-cv-04216
Estate of Robert Wayne Lewis, et al vs. Cumberland County, et al	1:16-cv-03503
Estate of Jon Leon Watson, et al vs. Cumberland County, et al	1:16-cv-06578
Estate of Megan Moore, et al vs. Cumberland County, et al	1:17-cv-02839
Estate of David Conroy, et al vs. Cumberland County, et al	1:17-cv-07183

Dear Judge Donio:

Please accept this correspondence as Plaintiffs' submission of explanation regarding the issue raised by the Court concerning the appointments of the administrators ad pros and timing of the appointments of general administrators for each of the listed estates and whether the respective administrators ad pros at times during the pendencies of the relevant civil actions had authority to accept settlements.

According to the Surrogate of Cumberland County an administrator ad pros is appointed for litigation purposes and has authority to make decisions on behalf of the estate regarding the litigation, including settlement.

Regarding the six (6) subject jail suicides, the estates of the decedents had no assets when suit was initiated for each case. As such, the appointments of general administrators were not necessary because the estates had no assets identified to distribute

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Once the settlements were accepted by the ad pros administrators, the assets of each estate were identified and hence, it was time for the appointments of the general administrators because an ad pros administrator is merely the conduit through which a recovery passes to the estate.

At all times relevant to these matters, counsel prepared and delivered all documents required by the Surrogate of Cumberland County to have the appropriate administrators ad pros and general administrators appointed at the appropriate times in compliance with New Jersey's Statutes governing the administration of estates upon death by wrongful act.

Respectfully Submitted,

CONRAD J. BENDETTO

CJB/mb

cc: *VIA ELECTRONIC FILING*

*Stephen Holtzman, Esquire*

*A. Michael Barker, Esquire*